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13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION
17

18 TONY ROLAND MARTINEZ, on behalf of
19 themselves and all others similarly situated,

20 Plaintiffs,

21 v.

22 SONY COMPUTER ENTERTAINMENT
23 AMERICA LLC, and SONY NETWORK
ENTERTAINMENT INTERNATIONAL LLC,

24 Defendants.
25

Case No. 3:11-cv-02900-MEJ

**STIPULATION TO EXTEND
TIME FOR DEFENDANTS TO
MOVE, ANSWER, OR
OTHERWISE RESPOND TO
COMPLAINT**

Judge: Honorable Maria-Elena James

26 WHEREAS, defendants Sony Computer Entertainment America LLC ("SCEA") and
27 Sony Network Entertainment International LLC ("SNEI"), as well as certain related entities
28 (collectively, the "Sony Defendants"), have been named as defendants in at least twenty-six (26)

STIPULATION TO EXTEND TIME FOR DEFENDANTS TO
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1 putative class action lawsuits within this District, to date (collectively, the “N.D. Cal. Sony
2 Litigations”);

3 WHEREAS, certain of the Sony Defendants have also been named as defendants in at
4 least thirty-two (32) putative class action lawsuits pending outside this District, to date
5 (collectively, with the N.D. Cal. Sony Litigations, the “U.S. Sony Litigations”);

6 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict
7 Litigation (the “JPML”) to centralize this and other matters, to which various responses have been
8 filed to date, including Sony Defendants’ response;

9 WHEREAS, the current deadline for SCEA to respond to the operative complaint in the
10 above-entitled action (“Complaint”) is July 19, 2011;

11 WHEREAS, the parties have agreed to the extension of time herein for the defendants in
12 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to
13 facilitate the scheduling of this matter in coordination with the schedule for the motion before the
14 JPML;

15 NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,
16 by and through their respective counsel, hereby stipulate as follows:

17 The deadline for the defendants to respond to the Complaint in the above-captioned action
18 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict
19 litigation centralizing the above-captioned action with other matters, or if centralization is denied
20 by the JPML, then 30 days from the date of such order denying centralization.

21 Either party may seek ex parte relief from this stipulated Order for good cause shown,
22 including, but not limited to, defendants’ filing of a responsive pleading in a related case.

1 Dated: July 1, 2011

DANIEL R. TAMEZ, ESQ.
GNAU & TAMEZ LAW GROUP, LLP
MAJED NACHAWATI
BRYAN FEARS
JEREMY R. WILSON

4 By: /s/ Daniel R. Tamez /s/ [as authorized]
Daniel R. Tamez, Esq.
Attorneys for Plaintiff
TONY ROLAND MARTINEZ

7 Dated: July 1, 2011

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THAD A. DAVIS
ROCKY C. TSAI
ROPES & GRAY LLP

10 By: /s/ Rocky C. Tsai /s/
Rocky C. Tsai

11 Attorneys for Defendants
12 SONY COMPUTER
13 ENTERTAINMENT AMERICA LLC
14 and SONY NETWORK
ENTERTAINMENT INTERNATIONAL
LLC.

15 **~~[PROPOSED]~~ ORDER**

16 PURSUANT TO STIPULATION, IT IS SO ORDERED.

18 Dated: July 6, 2011

19 By: 
U. S. District Court Magistrate Judge